



July 18, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th St, S.W.  
Washington, DC 20554

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Re: MB Docket No. 15-146 - Amendment of Parts 15, 73 and 74 of the Commission's Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band For Use By White Space Devices and Wireless Microphones

Dear Ms. Dortch:

On behalf of the US Hispanic Chamber of Commerce (USHCC), we are writing in opposition to the Federal Communications Commission's proposed vacant channel rule. As the leading organization of its kind the USHCC represents over 4.1 million Hispanic-Owned business across the U.S. We have as our focus to strengthen national programs that incentivize economic development for Hispanic firms, and further to ensure that legislation and regulatory actions positively impact our businesses and communities. In our view the Commission's proposal negatively impacts ownership opportunities among Hispanic low-power television (LPTV) broadcasters, and unnecessarily jeopardizes programming on which many in our community rely.

In addition, the USHCC is concerned about this proposal because our organization represents Hispanic-owned businesses; businesses that rely heavily on advertising on local television. Both low and full-power local television stations provide a tremendous pathway for our members to reach consumers in their communities, and to build and grow their businesses by reaching those consumers – in English and in Spanish – and turn them into customers. Any proposal that negatively affects LPTV not only impacts our communities, but also affects our members – business owners – their employees and current and/or potential customers.

According to analysis conducted by the Community Broadcasters Association, 24% of LPTV owners are Hispanic and 34% provide foreign language programming, of which 72% provide programming in Spanish.<sup>1</sup> The Hispanic communities that U.S. Hispanic Chamber members serve heavily rely on LPTV for local and community news, information on civic engagement, public safety, public health, faith-based programming, entertainment and emergency information.

The USHCC is not alone in its concern about this important issue. In December, a coalition of [ten rural and agricultural organizations](#) wrote the FCC to express similar concerns about the proposal's threats to LPTV and translators, and last month, a coalition of [nine diversity and civil rights organizations](#) wrote the FCC to raise their voices in opposition. Several other organizations such as the [National Association of Black Owned Broadcasters](#) (NABOB), the [Multicultural Media, Telecom and Internet Council](#) (MMTC), [Asian Americans Advancing Justice - AAJC](#) and the [Japanese American Citizens League](#) have also written the FCC expressing the concerns that we share with you today.



It is imperative that the Commission pause any consideration of the vacant channel proposal, and hold any action in abeyance until after both the FCC and the public fully appreciate the losses from the spectrum auction, and the FCC has the opportunity to study – and share with the public – the potential impact of the proposal on minority ownership.

Sincerely,

Javier Palomarez  
President & CEO  
USHCC

CC:

Commissioner Mignon Clyburn  
Commissioner Michael O'Rielly  
Commissioner Ajit Pai  
Commissioner Jessica Rosenworcel

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